

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE: LIBOR-BASED FINANCIAL
INSTRUMENTS ANTITRUST LITIGATION

MDL No. 11-md-2262 (NRB)

THIS DOCUMENT RELATES TO:

ALL ACTIONS

**[PROPOSED] ORDER GRANTING PLAINTIFFS'
REQUEST FOR ISSUANCE OF A HAGUE CONVENTION REQUEST FOR
INTERNATIONAL JUDICIAL ASSISTANCE TO TAKE TESTIMONY OVERSEAS –
SIMON MILNER, DEAN JOHNSON, GERRY MCGRAIL, MARK YEXLEY,
BERNARD SHARPE, ROBERT DENCH, MARK ANDRADE, AND MARK
BRIDGEWATER**

The Court has reviewed Plaintiffs' Request for Issuance of a Hague Convention Request for International Judicial Assistance to Take Testimony Overseas – Simon Milner, Dean Johnson, Gerry McGrail, Mark Yexley, Bernard Sharpe, Robert Dench, Mark Andrade, and Mark Bridgewater, the supporting Declaration of Michael C. Kelso, the proposed Letters of Request, and all other accompanying submissions. The Court GRANTS Plaintiffs' request.

Neither this Order, the transmission of the Letters of Request to the UK Special Master pursuant to the Hague Convention, any examination of documents by the UK Special Master, nor the terms of the Letter of Request (which are incorporated into this Order) shall constitute or operate as a waiver or admission of any argument, position, objection, allegation, claim, or defense of Plaintiffs or Defendants in the above-captioned action, including any defense to personal jurisdiction or venue that Defendants have raised or otherwise may have, or of the attorney-client privilege, the work product doctrine, or any other privileges, rights, protections, or prohibitions

that may apply to that evidence under the law of the United Kingdom, the United States, the State of New York, or the law of any other applicable state.

Dated: October 31, 2023
New York, New York

SO ORDERED



Naomi Reice Buchwald
United States District Judge